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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
Northern Division

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

DAVID B. KAPLAN, ESQ.,

Honorable Marcia S. Krieger

SYNCHRONIZED ORGANIZATIONAL
SOLUTIONS, LLC,

SYNCHRONIZED ORGANIZATIONAL
SOLUTIONS INTERNATIONAL, LTD.,
and MANNA INTERNATIONAL
ENTERPRISES, INC.,

Defendants,

Case No. 3:16-cv-00270-MMD-VPC

Honorable Miranda M. Du

**STIPULATION TO EXTEND TIME TO
FILE A RESPONSE TO MOTION TO
COMPEL SEC'S ACCOUNTING AND
DISTRIBUTION OF FUNDS TO HARMED
INVESTORS**

FIRST REQUESTED EXTENSION

and

LISA M. KAPLAN,
THE WATER-WALKING
FOUNDATION, INC., and
MANNA INVESTMENTS, LLC,

Relief Defendants.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties, as follows:

1. On January 18, 2024, Dean Properties, LLC, through its counsel of record, Matthew Pruitt, Esq. of Kirton McConkie, PC, filed a Motion to Compel the SEC's Accounting and Distribution of Funds to Injured Investors (hereinafter "Motion to Compel"). (ECF No. 162).

2. Plaintiff SEC hereby requests an additional 21 days to prepare a response to the Motion to Compel.

3. The SEC and counsel for Dean Properties have agreed to the 21-day extension, during which time the SEC will prepare a fair and reasonable proposed timeline for the distribution of funds to harmed investors.

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4. Accordingly, the Parties respectfully request that the time to file a response to the Motion to Compel be extended until February 22, 2024.

Date: January 26, 2024

/s/ Alyssa A. Qualls

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/s/ Matthew Pruitt

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Counsel for Plaintiff United States Securities
and Exchange Commission

Counsel for Dean Properties, LLC.

IT IS SO ORDERED:



The Honorable Miranda M. Du, Chief
United States District Judge

Dated: January 26, 2024